

Platform of associations calls for fundamental revision of needs assessment

The needs assessment drafted by the BMEL is not reflective of agreements already reached and of significant agri-policy processes. Important target conditions are not quantifiable. Export orientation as a root cause of existing problems is not being addressed.

By letter dated July 3, 2020, the Federal Ministry of Food and Agriculture (BMEL) asked the associations for a statement on a draft needs assessment, one of the components of the CAP Strategic Plan for the EU Common Agricultural Policy (CAP) post-2020. The draft concerned is based on the BMEL draft SWOT analysis¹ which analyses the strengths, weaknesses, opportunities and risks of the current agricultural system with regard to the “specific objectives” of the future CAP. In their statement of September 18, 2019 the Platform strongly criticised the draft SWOT analysis and set out the rationale² as to why this draft does not yet constitute a sound basis for a needs-based, targeted and consistent design of the CAP post-2020. The SWOT analysis’ major shortcomings are now perpetuated in the draft needs assessment.

It is hard to comprehend why the draft needs assessment does not deduce any of the needs or target conditions from key political EU-level initiatives such as the Green Deal, the Farm to Fork Strategy or the EU Biodiversity Strategy even though these initiatives set out clear targets with regard to the environment, climate protection, animal welfare, the economic situation of agricultural holdings, and social participation. Similarly, no tangible needs or target conditions are deduced from the experiences gained during the corona crisis despite the fact that given the recent experiences one would for example almost inevitably need to conclude that meat processing needs to be regionalised. Moreover, the needs assessment precludes important agri-policy processes that are currently underway in Germany but not yet completed even though they are supposed to be of key importance for the future orientation of the farming sector and agricultural policy. These include, for example, the arable farming and grassland strategy (*Ackerbau- und Grünlandstrategie*), the commission on the future of agriculture (*Zukunftskommission Landwirtschaft*) or the 2020 agricultural census which is conducted only once every ten years with the declared aim of “... *underpinning current political and societal discussions in the agricultural sector with hard data and factual evidence for objective debate*”³. Similarly, the draft neither makes reference to nor reflects the findings and concept for a path to restructuring animal husbandry presented by the skills network on livestock husbandry (“*Borchert-Kommission*”) despite the fact that its recommendations enjoy widespread political and societal backing. Especially in light of the time gained as a result of the recent adoption of the CAP transitional regulation, the Platform is of the view that needs and target conditions for the purposes of the needs assessment must now urgently be deduced from the processes mentioned above because, after all, the needs assessment is designed to prioritise the needs to be targeted by the national CAP implementation measures.

¹https://www.bmel.de/SharedDocs/Downloads/DE/Landwirtschaft/EU-Agrarpolitik-Foerderung/swot-tabellen.pdf?__blob=publicationFile&v=1

²https://www.bund.net/fileadmin/user_upload_bund/publikationen/landwirtschaft/landwirtschaft_swot_gap_bmel.pdf

³ <https://www.destatis.de/DE/Themen/Branchen-Unternehmen/Landwirtschaft-Forstwirtschaft-Fischerei/Landwirtschaftszaehlung2020/inhalt.html;jsessionid=182ACE5E6E3017A23697844D32846A11.internet8731#sprg371830> (translated quote)

One of the needs assessment's central weaknesses is the disproportionately large share of the 64 needs outlined whose target conditions are not quantifiable. This quantifiability is however indispensable for the selection and weighting of appropriate instruments and, in the context of implementation, of assessments as to the success or otherwise of potential interventions. Already existing targets, such as for example with regard to species protection or for reductions in nitrogen surpluses as set out in the Federal Government's 2030 National Sustainable Development Strategy, are not included in the needs assessment. While many sections of the draft make general reference to the particular significance of soils with regard to their capacity for carbon sequestration by means of increased soil organic matter and the resultant positive effects in terms of, for example, climate protection, the water regime and protection from erosion, the draft does not set out a clearly defined target with respect to halting the overall loss of soil organic matter observed on arable land in Germany as documented in the BMEL soil status report ("*Bodenzustandsbericht*") published in 2018⁴. Similarly, there is no reference in the draft to the need to safeguard GM-free agriculture even though this would offer a competitive advantage in terms of market access for a growing proportion of the German agri-food industry.

Similar to the SWOT analysis, the draft needs assessment fails to adequately portray and address the key agricultural sectors, the interplay between them, and the multifunctionality of the farming sector. Tangible needs and target conditions are missing, for example for the dairy market, the pig and poultry sectors, and for arable farming. The same holds true for targets with respect to securing adequate incomes by means of cost-covering producer prices (e.g. through a wider distribution of CAP funding and the remuneration of the provision of services of general interest). The draft assessment instead advocates easier access by agricultural holdings to outside capital even though it is well known that investors external to the agricultural sector have been taking an increasing interest in agricultural land, and especially so in Eastern Germany, a development that has become a serious problem for rural areas⁵. The draft assessment does not portray or translate into relevant needs or target conditions the massive barriers resulting from the farming sector's highly capital-intensive nature⁶ (capital requirement per worker) that are faced by young people attempting to establish agricultural livelihoods.

The needs assessment's greatest weakness is that it does not explicitly question the now decades-long European and German agricultural sectors' export orientation and the associated expenditure-oriented specialisation and rationalisation of agricultural holdings. And this is despite the fact that this export-orientation is a main driver of the economic crisis faced by a great number of agricultural holdings, of the sector's exceedances of ecological carrying capacities, and of society's critical attitude to large segments of the farming sector. The expand-or-perish dogma damages diverse agricultural structures and thus ultimately also rural areas as a whole. At the same time it is more than evident that the pursuit (to date) of global market leadership in the agricultural sector is doomed to fail given the in global terms relatively high labour costs, the relatively small-scale spatial configuration of agricultural land, and the justifiable aspirations in terms of environmental and animal welfare standards. It is the Platform's conviction that only the pursuit of a strategy dedicated

⁴https://www.bmel.de/SharedDocs/Downloads/DE/Broschueren/Bodenzustandserhebung.pdf;jsessionid=6D5D2D9EB050F90B44D40D9615F1C0B9.internet2851?_blob=publicationFile&v=6

⁵ https://www.thuenen.de/media/publikationen/thuenen-report/Thuenen-Report_52.pdf

⁶ <https://www.bauernverband.de/situationsbericht/3-agrarstruktur/31-kapitaleinsatz>

to quality and a predominance of food production for local markets offers a substantial solution to the challenges outlined. The BMEL draft assessment in its current form does not succeed in taking into account these basic needs or in adequately portraying and translating into tangible objectives the interactions and interrelationships in the farming sector and agricultural policy. In light of the major shortcomings outlined above and in light of the outstanding importance of the CAP for the future of farming, the Platform of Associations calls for the fundamental revision of the needs assessment drafted by the BMEL as well as for the comprehensive involvement of the associations constituting the Platform.

Going beyond this general critique, please refer to the individual associations' statements for details with regard to the specific needs.

Berlin,
July 22, 2020

This Platform statement was jointly prepared by the associations involved in the Platform and was coordinated by Friends of the Earth Germany (*Bund für Umwelt und Naturschutz Deutschland e.V., BUND*) in cooperation with the German family farmers' association AbL (*Arbeitsgemeinschaft bäuerliche Landwirtschaft*).

Contacts:

Phillip Brändle, AbL, braendle@abl-ev.de
Christian Rehmer, BUND, christian.rehmer@bund.net